

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ANDRES MARTINEZ)
v.) CIVIL ACTION NO.
UNITED STATES OF AMERICA,)
Respondent)
)
) 08-cv-10782-PBS
)

UNITED STATES' MOTION FOR EXTENSION OF
TIME TO FILE OPPOSITION TO DEFENDANT'S
PETITION PURSUANT TO 18 U.S.C. §2255

The United States respectfully moves this Court for an extension of time, until July 11, 2008, to submit an opposition to petitioner Andres Martinez's motion to vacate, set aside, or correct sentence pursuant to 18 U.S.C. §2255. As grounds, the government submits that undersigned counsel recently completed a jury trial on Monday, July 7, 2008 in the case of U.S. v. Jadlowe, 05-10306-RGS.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Neil Gallagher
Neil J. Gallagher, Jr.
Assistant U.S. Attorney

DATED: July 11, 2008

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon the person listed below a copy of the foregoing document by depositing in the United States mail a copy of same in an envelope bearing sufficient postage for delivery:

Andres Martinez
80442-038
FCI - Allenwood
P.O. Box 1000
White Deer, PA 17887

This 11th day of July 2008.

/s/ Neil Gallagher
NEIL GALLAGHER
ASSISTANT UNITED STATES ATTORNEY